

UNITED STATES OF AMERICA) No. _____
)
 v.) Violation: Title 18, United
) States Code, Section 1503
 ROGER STANLEY)

B. Pursuant to Illinois law, the Office of the Secretary of State (hereinafter "SOS Office") was entrusted with comprehensive duties involving motor vehicles, including licensing drivers, administering and enforcing driver safety, maintaining driving records, selling and distributing license plates and vehicle registration validation stickers, and issuing and maintaining

records of vehicle titles. In the performance of its lawful functions, the SOS Office awarded contracts for goods and services to outside entities and individuals.

C. Beginning in or about August 1994, the SOS Office authorized the award of direct mail-related contracts relating to the promotion and marketing of the Organ Donor Program, an SOS Office program designed to develop public awareness for the cause of organ donations (hereinafter referred to herein as the "Organ Donor Contracts"). The SOS Office awarded the Organ Donor Contracts to and for the financial benefit of defendant ROGER STANLEY. However, in order to conceal STANLEY's participation and financial benefit in the Organ Donor contracts, the Organ Donor contracts were awarded in the name of Grafcom, an entity known to STANLEY.

D. On or about December 31, 1996, the SOS Office authorized the hiring of ROGER STANLEY as an employee of the office for the principal purpose of enhancing STANLEY's state pension benefits, which are based on the length of employment with the State of Illinois. On or about January 3, 1997, STANLEY was placed on the SOS Office payroll. On or about February 14, 1997, having qualified for the enhanced pension benefits, STANLEY resigned from the SOS Office position.

E. For certain periods while STANLEY had a business relationship with the SOS Office, STANLEY provided free and

heavily-subsidized vacations and related vacation benefits to Costa Rica; Door County, Wisconsin; and Lake Ontario, Canada to one or more SOS Office officials.

F. Individual A, who was a high-ranking SOS Office official, was a guest of Stanley's on a February 1997 Costa Rican trip. Defendant STANLEY paid for the principal expenses of Individual A on the February 1997 Costa Rican trip, which included airfare, lodging, fishing and other expenses. At no time did Individual A ever reimburse STANLEY for expenses incurred on the 1997 trip on behalf of Individual A.

Federal Grand Jury Investigation

2. In or about the Spring of 1998, the SPECIAL JUNE 1997-2 Grand Jury sitting in Chicago, Illinois, commenced grand jury investigation 98 GJ 596 (the "Grand Jury Investigation"). Successive federal grand juries, including the SPECIAL JANUARY 1999-2 Grand Jury, the SPECIAL JULY 2000-2 Grand Jury, and the SPECIAL APRIL 2002 Grand Jury have continued the Grand Jury Investigation, into among other things, allegations of official misconduct, corruption and fraudulent conduct relating to the Illinois Secretary of State's Office ("SOS Office") and certain individuals doing business with the SOS Office, including defendant STANLEY. The Grand Jury Investigation continues up to and including the date of the return of this indictment.

3. On or about September 21, 2001, in furtherance of the Grand Jury Investigation, STANLEY's principal business, Unistat, was served with a grand jury subpoena (the "September 21, 2001 Subpoena"). Among other things, the September 21, 2001, Subpoena requested all information relating to payments made by specified SOS Office officials, including Individual A, for trips to Door County, Lake Ontario and Costa Rica.

4. On or about September 21, 2001, defendant STANLEY personally received notice of the Subpoena and caused to be gathered and created documents responsive to the Subpoena. Among the documents STANLEY caused to be created and provided in response to the Subpoena, was a document indicating that Individual A reimbursed STANLEY \$1,500 for expenses incurred relating to the 1997 Costa Rican trip.

5. On or about January 22, 2002, in Chicago, Illinois, Northern District of Illinois, Eastern Division, and elsewhere,

ROGER STANLEY,

defendant herein, corruptly endeavored to influence, obstruct, and impede the due administration of justice; namely, defendant STANLEY, knowing that his financial relationship with certain SOS Office officials, including Individual A, was material to the Grand Jury Investigation, caused a Unistat employee to authenticate and describe a false and fraudulent document to federal investigators in response to the September 21, 2001 Subpoena. The

false and fraudulent document indicated that Individual A reimbursed defendant STANLEY \$1,500 for the 1997 Costa Rican trip when, in truth and fact, as defendant STANLEY well knew, Individual A made no payments or reimbursements to STANLEY for the trip, in violation of Title 18, United States Code, Section 1503.

A TRUE BILL:

Foreperson

United States Attorney

